

# **Exhibit 1**

**jonathan.miller@lawyer.com**

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**From:** Damon Neagle <damonneagle@designip.com>  
**Sent:** Tuesday, January 24, 2023 9:01 PM  
**To:** jonathan.miller@lawyer.com  
**Cc:** Robert L. Epstein; Molly Schneider  
**Subject:** Updated Rule 26(a)(1)(A)(i) Disclosure

Gentlemen:

Out of an abundance of caution, we wish to formally identify Arthene Derr and Colleen Knauss of Coopersburg Sports as potential witnesses for the defense. Both were identified by Mr. Pino in his deposition as having knowledge of Beverage Bat revenue and expenses. Both are part time employees of Coopersburg. If we choose to call either of them as witnesses, we expect their testimony to be focused on damages (revenue and expenses). Should you choose to call either of them as part of the Plaintiff's case, we will assist in securing their availability.

Damon A. Neagle

**Design IP** *A Professional Corporation*  
1575 Pond Road, Suite 201 | Allentown, PA 18104 USA  
direct: 610.395.8005 | main: 610.395.4900 | web: [www.designip.com](http://www.designip.com)

